
FERTITTA REYNAL, L.L.P.

October 10, 2019

VIA ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: **United States v. Jeffrey Shulse, et al., No. 1:16-cr-640-BMC**

Dear Judge Cogan:

We represent Jeffrey Shulse in the above-captioned case. Mr. Shulse was indicted in December 2016 and is set for trial in February 2020. We respectfully request that Mr. Shulse's bond conditions be modified to allow him to travel within the continental United States with out prior Court approval.

Both the United States Attorney's Office and U.S. Pretrial Services are unopposed to this request. Mr. Shulse works for a company that has projects in multiple states and bids on contracts nationwide. Additionally, although Mr. Shulse lives in Texas, he has family members in other parts of the United States.

Respectfully submitted,

/s/ F. Andino Reynal

cc: All counsel of record via ECF
Melissa Siberon, U.S. Pretrial Services, via email